

### REMARKS

Reconsideration of the present application is respectfully requested. Claims 1, 2, 4, and 7 have been amended. No claims have been added or canceled in this amendment. No new matter has been added.

Claims 14-16 stand allowed. Claims 1 and 5 stand rejected under 35 U.S.C. § 102(b) based on U.S. Patent no. 5,975,738 of DeKoning et al. ("DeKoning"). Claims 2-4 and 6-13 stand rejected under 35 U.S.C. § 103(a) based on DeKoning in view of one or more other references.

The specification has been amended to update the status of three of the applications that were incorporated by reference.

### Discussion of Rejections

#### Claim 1

Claim 1 stands rejected under 35 U.S.C. § 102(b) based on DeKoning. Applicants respectfully disagree with the Office's interpretation of DeKoning, particularly regarding the limitation, "reassigning ownership of at least one of the mass storage devices . . . ." However, this issue is believed to be moot in view of the above amendments to the claims.

DeKoning does not teach or suggest a method of *reconfiguring* a storage system as recited in claim 1, particularly such a method which includes:

converting [a] standalone storage server into a JBOD set; and  
integrating the JBOD set into a modular storage server system to  
enable the plurality of mass storage devices to be controlled by a second  
storage server head that is external to the chassis.

Support for these added limitations can be found in (*inter alia*) paragraphs [0005] and [0028] of the present application.

DeKoning does not disclose or suggest either of the above-quoted operations recited in claim 1. Note that DeKoning does not relate to physical reconfiguration of a storage system, as does the present invention. Rather, DeKoning is directed to a technique for detecting and responding to a *failure condition*, i.e., the failure of a RAID controller in a storage subsystem. The present invention, on the other hand, relates to a technique for physically reconfiguring a storage system, which may be done in the absence of any failure, such as when upgrading a storage system to include a more powerful storage server "head". In particular, embodiments of the invention relate to a technique for integrating a JBOD (Just a Bunch of Disks) set, which has been obtained by converting a standalone storage server into the JBOD set, into a modular storage system, in which a separate, (e.g., more powerful) external storage server head assumes ownership of the disks (or at least some of them) in the JBOD set.

There is no disclosure or suggestion in DeKoning of such a technique, nor the specific operations noted above recited in claim 1, nor is there any motivation to try to achieve such a technique based on DeKoning. Therefore, claim 1 and all claims which depend on it are believed to be patentable over the cited art.

#### Claim 7

Claim 7 has been amended to recite that the claimed "disconnecting" and "removing" operations are part of the operation, "converting the integrated storage system into a JBOD set". Such an operation is not disclosed or suggested in DeKoning,

Application No.: 10/826,757

Application no.: 10/826,757

as noted above. Therefore, claim 7 and all claims which depend on it are believed to be patentable over the cited art.

#### Dependent Claims

In view of the above remarks, a specific discussion of the dependent claims is considered to be unnecessary. Therefore, Applicants' silence regarding any dependent claim is not to be interpreted as agreement with, or acquiescence to, the rejection of such claim or as waiving any argument regarding that claim.

#### Conclusion

For the foregoing reasons, the present application is believed to be in condition for allowance, and such action is earnestly requested.

#### Request for Telephone Interview

Applicants respectfully request that the Examiner contact the undersigned at (408) 720-8300 to schedule a telephone interview, in the event the Examiner does not find the present application to be allowable after considering this response.

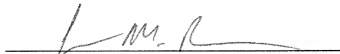
If there are any additional charges/credits, please charge/credit our deposit account no. 02-2666.

Application no.: 10/826,757

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

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Jordan M. Becker  
Reg. No. 39,602

Customer no. 48102  
1279 Oakmead Parkway  
Sunnyvale, CA 94085-4040  
(408) 720-8300